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16 Attorneys for Defendant

17 CITY OF PETALUMA (erroneously sued herein as CITY OF PETALUMA and  
18 PETALUMA POLICE DEPARTMENT)

19 UNITED STATES DISTRICT COURT

20 NORTHERN DISTRICT OF CALIFORNIA

21 SAN FRANCISCO DIVISION

22 JANINE NARETTO, MATTHEW  
23 ERICKSON, JONATHAN THOMAS  
24 HOLDWAY, TODD SIMONE, individuals;  
25 HOMELESS ACTION! an unincorporated  
26 association, on behalf of itself and those it  
27 represents,

28 Plaintiffs,

v.

CITY OF PETALUMA and PETALUMA  
POLICE DEPARTMENT,

Defendants.

Case No. 21-cv-10027-EMC

**DEFENDANT CITY OF PETALUMA'S  
STATUS REPORT**

DATE: June 10, 2022

TIME: 3:30 p.m.

DEPT: Zoom/Courtroom 5

1 Pursuant to the Court's request (Dkt. 78), Defendant City of Petaluma provides this status  
2 report and updated chart on its ongoing outreach efforts and offers of housing to the unsheltered  
3 community members at Steamer Landing Park, as follows:

4 On May 12, 2022, the Court ordered that the previously issued preliminary injunction  
5 which prohibited the City from enforcing its anti-camping ordinance and/or removing the  
6 individual named Plaintiffs from the Steamer Landing Park will be dissolved effective as of June  
7 10, 2022. Pursuant thereto, the Court ordered the City to provide an update as to its ongoing  
8 outreach efforts and offers of shelter. Both prior to that ruling and continuing at all times  
9 thereafter, the City and its community partners have engaged in outreach efforts which are  
10 focused on helping the unsheltered community members to understand and avail themselves of  
11 available services, including offers of shelter. Those opportunities are directly shared with the  
12 campers via a number of methods, including direct discussions, on-site meetings, the  
13 dissemination of literature (which is personally handed to the campers, as well as posted at  
14 Steamer Landing) through the City's community partners, as well as through the internet. Those  
15 outreach efforts have also included several visits to Steamer Landing, wherein representatives  
16 from the City have personally visited every camp and attempted to meet with every person on-  
17 site to not only advise of the impending closure, but to also advise on the options available for  
18 shelter and to assist the unsheltered community members in identifying and receiving services.

19 Although the City and its community partners outreach efforts have been ongoing since  
20 before this litigation was commenced, this status report will focus on the actions taken following  
21 the Court's May 12, 2022, ruling.

22 On May 18, 2022, representatives from the City visited each of the campsites at Steamer  
23 Landing to personally notify the campers of the impending closure of the encampment. In  
24 addition to verbally advising each camper of the options available for shelter, written materials  
25 were left that not only advised of the specific closure dates, but also provided information on  
26 how to obtain services. Copies of those materials are attached hereto as **Exhibit 1**. The specific  
27 individuals who were contacted during that visit were as follows:

28 ///

- 1.) Vasquez-Cruz, Roberto Fidel-Camp 2L
- 2.) Garcia, James Anderson-Camp 1L
- 3.) Mahoney, Karen-Parking lot
- 4.) Silva, Joel-Camp 5S
- 5.) Gonzalez, Jorge-Camp 8S
- 6.) Monroe, Fredrick Pressler-Camp 12S
- 7.) Irving, Matthew-Camp 14L
- 8.) Lynch, Daniel-Camp 20S
- 9.) Reys-Caballero, Edwin-Camp 3S
- 10.) DeRosa, Shawna-Camp 16S
- 11.) Nejia, Nelly-Camp 18S
- 12.) Jose-Rivera, Guadalupe-Camp 18S
- 13.) Thornton, Melody-Camp 25L
- 14.) Engelhardt, Oden-Camp 25L
- 15.) McIlvian, Walter-Camp 4L
- 16.) Gutierrez, Jesus-none specifically
- 17.) Gray, Adam-none specifically
- 18.) Flores, Jorge-Camp 26S
- 19.) Christ, Gary-Camp 28S
- 20.) Tournahu, Robert-Camp 29S
- 21.) Hudnell, William-Camp 31S
- 22.) Simone, Todd-Camp 31L
- 23.) Sluys-Dunbar-Camp 31L
- 24.) Santos, Abraham-Camp SE side of the Peninsula
- 25.) Holman, Marcus-Camp NW side of the Peninsula by the Barn
- 26.) Kennedy, James-Camp NW side of the Peninsula by the Barn
- 27.) Eads, Robyn-Camp SW side of Peninsula by water

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1 28.) Elawand, Jason-Camp SW side of Peninsula by water

2 29.) Gracie, Shelly-Camp SE side of the Peninsula

3 On May 22, 2002, a further visit was undertaken where representatives again contacted  
4 the campers, including disseminating information and literature, including having the literature  
5 translated into Spanish. In addition to meeting personally with each of the campers, notices  
6 were also posted in English and Spanish at the entrances to Steamer Landing. Copies of those  
7 materials are attached hereto as **Exhibit 2**. The following additional people were provided  
8 literature during the May 22, 2022, visit:

9 1.) Jorge Gonzalez

10 2.) James Anderson Garcia

11 3.) Hugo Lopez

12 4.) Edwin Reyes-Caballero

13 Another visit was conducted on May 25, 2022. During that visit, representatives again  
14 met with the individual campers and again advised of the impending closure, including  
15 providing literature on the options for obtaining shelter and/or services. That information was  
16 provided both orally and in writing.

17 A further visit was on June 3, 2022. In addition to verbally advising each camper of the  
18 options available for shelter, written materials were left that not only advised of the specific  
19 closure dates, but also provided information on how to obtain services. Copies of those  
20 materials are attached hereto as **Exhibit 3**.

21 In addition to the foregoing, City staff and COTS were also on-site following a fire that  
22 originated in the encampment from an unsupervised flame in one of the campsites. The fire  
23 completely destroyed two campsites while endangering other campsites and neighboring  
24 structures. Fortunately, no significant injuries resulted from that fire. Following the Petaluma  
25 Fire Department and the Petaluma Police Department bringing the matter under control,  
26 representatives from the City and COTS took the opportunity to meet with campers and again  
27 offered services, including shelter.

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1 The City and its community partners, including COTS, DST, PCH, and SAFE Team, are  
2 currently planning to conduct another on-site signup during the week of June 6, 2022, in  
3 furtherance of their efforts to enroll the unsheltered community members for Coordinated Entry  
4 and/or to extend offers of shelter.

5 In addition to the foregoing, the City's community partners (including specifically  
6 COTS) have continued to make regular visits to the site to meet with and extend offers of  
7 shelter. As this Court is aware, the City and its community partners have been conducting  
8 outreach efforts since long prior to this litigation being commenced. Those efforts have  
9 remained ongoing and include almost daily visits to Steamer Landing Park by COTS' outreach  
10 specialist Randy Clay.<sup>1</sup> Details of COTS' and Mr. Clay's ongoing outreach efforts are included  
11 in the attached **Exhibit 4**, which is a spreadsheet maintained by COTS that reflects the status of  
12 housing offers, responses, and other relevant information for all campers at Steamer Landing.  
13 This spreadsheet incorporates Mr. Clay's notes from his visits to Steamer Landing and reflects  
14 the most current list of Steamer Landing Park campers. As is noted on the spreadsheet, each and  
15 every camper at Steamer Landing has been personally contacted and offered services, including  
16 shelter. In addition, each of the campers has been provided literature which identifies some of  
17 the other service providers that are available to the campers.

18 In addition, all unsheltered community members are still, and have always been,  
19 welcome to join COTS during its lunch and dinner periods where free meals are provided, and  
20 COTS' personnel can assist interested individuals in completing applications for shelter, with  
21 COTS having multiple open beds. Further, COTS staff, as well as the City's other community  
22 partners, will be working to leverage any and all options to support housing placements –  
23 Emergency Housing Vouchers, Veterans Housing Vouchers, Coordinated Entry Permanent  
24 Supportive Housing Placements, Rapid Rehousing, and case management support in hopes of  
25  
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27  
28 <sup>1</sup> Additional outreach efforts are also provided by the City's other community partners, including for  
example, the Downtown Streets Team and Catholic Charities. Since the primary offers of shelter to the  
Plaintiffs have been extended by COTS, this status report focuses only on COTS' recent efforts.

1 facilitating Plaintiffs and any other unsheltered community members' movement to permanent  
2 housing.

3  
4 Dated: June 3, 2022

Respectfully submitted,

5 **ORBACH HUFF & HENDERSON LLP**

6 By: /s/ Kevin E. Gilbert

7 Kevin E. Gilbert  
8 Attorney for Defendant  
9 CITY OF PETALUMA  
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